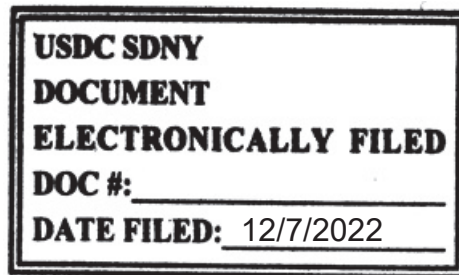


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November 30, 2022

**VIA ECF**

Honorable Robert W. Lehrburger  
United States Magistrate Judge  
500 Pearl Street, Room 1960  
United States Courthouse  
New York, NY 10007

Re: *Vallair Solutions SARL v. 321 Precision Conversions LLC*  
No. 1:21-cv-07507-CM

Dear Magistrate Judge Lehrburger:

We represent plaintiff Vallair Solutions SARL (“Vallair”) in the above-captioned matter. At the discovery hearing held before Your Honor on November 4th, you granted plaintiff’s motion to compel and ruled, *inter alia*, that defendant 321 Precision Conversions LLC (“Precision”) had to re-produce documents that had been redacted with the redactions removed, except for attorney-client privilege or work-product protection. This was memorialized in your Order of November 7, 2022 (Dkt. No. 83).

On November 9, 2022 in response to a query from counsel for plaintiff as to when the unredacted documents would be provided, counsel for Precision wrote “Our next production is very minimal and we are working on the unredacted documents. It should not be long on either.”

We will not burden this Court with copies of all the emails back and forth following that email response. We have yet to receive the unredacted documents. The production including the unredacted documents was made on October 21, 2022. As you will recall from the filings in this matter, the voluminous number of unredacted documents appear to be key to the substantive issues in this case. Also, the request for further time on this matter highlighted the need for these documents in unredacted form so that we could move on with discovery including identifying deficiencies, preparing for depositions, etc.

This is purely a continuation of the delay tactics of the defendant. We would ask that Your Honor not only order that the documents be produced immediately, but that Your Honor consider appropriate sanctions in light of plaintiff having to write yet another letter to request the assistance of the Court.

Honorable Robert W. Lehrburger

November 30, 2022

Page 2 of 2

Thank you.

Respectfully yours,

THE AXELROD FIRM, PC

/s/ Lisa J. Savitt

LISA J. SAVITT, ESQUIRE

LJS/cg

cc: Counsel of record via ECF

In light of Defendant's letter at Dkt. 91 representing that its document production is complete, Plaintiff's motion to compel immediate production is denied as moot without prejudice. The Court has considered the question of appropriate sanctions and determined that none are warranted.

SO ORDERED:

12/7/2022



HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE